

Name and address:

Christopher R. Pitoun (SBN 290235)  
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301 N. Lake Avenue, Suite 920  
Pasadena, California 91101

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

N.Z., et al.

Plaintiff(s),

CASE NUMBER

8:24-cv-01655-FWS-SSC

v.

FENIX INTERNATIONAL LIMITED, et al.

Defendant(s),

APPLICATION OF NON-RESIDENT ATTORNEY  
TO APPEAR IN A SPECIFIC CASE  
**PRO HAC VICE**

**INSTRUCTIONS FOR APPLICANTS**

- (1) The attorney seeking to appear pro hac vice must complete Section I of this Application, the certification in Section II, and have the designated Local Counsel sign in Section III. Space to supplement responses is provided in Section IV. The applicant must also attach a Certificate of Good Standing (issued within the last 30 days) from every state bar to which he or she is admitted; failure to do so will be grounds for denying the Application. Scan the completed Application, together with any attachment(s), to a single Portable Document Format (PDF) file.
- (2) Have the designated Local Counsel file the Application electronically using the Court's electronic filing system ("Motions and Related Filings => Applications/Ex Parte Applications/Motions/Petitions/Requests => Appear Pro Hac Vice (G-64)"), attach a Proposed Order (using Form G-64 ORDER, available from the Court's website), and pay the required \$500 fee online at the time of filing (using a credit card). The fee is required for each case in which the applicant files an Application. Failure to pay the fee at the time of filing will be grounds for denying the Application. **Out-of-state federal government attorneys are not required to pay the \$500 fee.** (Certain attorneys for the United States are also exempt from the requirement of applying for pro hac vice status. See L.R. 83-2.1.4.) A copy of the G-64 ORDER in Word or WordPerfect format must be emailed to the generic chambers email address. L.R. 5-4.4.2.

**SECTION I - INFORMATION**

Carey, Robert B.

Applicant's Name (Last Name, First Name & Middle Initial)

check here if federal government attorney ☐

Hagens Berman Sobol Shapiro LLP

Firm/Agency Name

11 West Jefferson, Suite 1000

(602) 840-5900

(602) 840-3012

Telephone Number

Fax Number

Street Address

Phoenix, Arizona 85003

rob@hbsslaw.com

City, State, Zip Code

E-mail Address

**I have been retained to represent the following parties:**

N.Z., R.M., B.L., S.M., and A.L.

☒ Plaintiff(s) ☐ Defendant(s) ☐ Other: \_\_\_\_\_

☐ Plaintiff(s) ☐ Defendant(s) ☐ Other: \_\_\_\_\_

Name(s) of Party(ies) Represented

List all state and federal courts (including appellate courts) to which the applicant has been admitted, and provide the current status of his or her membership. Use Section IV if more room is needed, or to provide additional information.

<u>Name of Court</u>	<u>Date of Admission</u>	<u>Active Member in Good Standing? (if not, please explain)</u>
Supreme Court of Arizona	5/9/1987	Yes
Supreme Court of Colorado	11/27/1987	Yes
USDC of Arizona	6/27/1988	Yes

List all cases in which the applicant has applied to this Court for *pro hac vice* status in the previous three years (continue in Section IV if needed):

<u>Case Number</u>	<u>Title of Action</u>	<u>Date of Application</u>	<u>Granted / Denied?</u>
2:23-cv-03419-ODW-S	LIM, et al. v. FARMERS GROUP, INC., et al.	6/27/2023	Granted

If any *pro hac vice* applications submitted within the past three (3) years have been denied by the Court, please explain:

*Attorneys must be registered for the Court's electronic filing system to practice pro hac vice in this Court. Submission of this Application will constitute your registration (or re-registration) to use that system. If the Court signs an Order granting your Application, visit [www.pacer.gov](http://www.pacer.gov) to complete the registration process and activate your e-filing privileges in the Central District of California.*

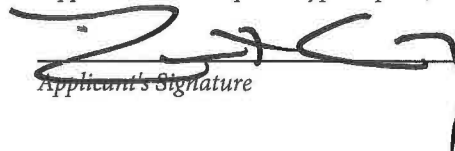
## **SECTION II - CERTIFICATION**

I declare under penalty of perjury that:

- (1) All of the above information is true and correct.
- (2) I am not a resident of the State of California. I am not regularly employed in, or engaged in substantial business, professional, or other activities in the State of California.
- (3) I am not currently suspended from and have never been disbarred from practice in any court.
- (4) I am familiar with the Court's Local Civil and Criminal Rules, the Federal Rules of Civil and Criminal Procedure, and the Federal Rules of Evidence.
- (5) I designate the attorney listed in Section III below, who is a member in good standing of the Bar of this Court and maintains an office in the Central District of California for the practice of law, in which the attorney is physically present on a regular basis to conduct business, as local counsel pursuant to Local Rule 83-2.1.3.4.

Dated 8/2/2024

Robert B. Carey  
Applicant's Name (please type or print)

  
Applicant's Signature

SECTION III - DESIGNATION OF LOCAL COUNSEL

Pitoun, Christopher R.

*Designee's Name (Last Name, First Name & Middle Initial)*

Hagens Berman Sobol Shapiro LLP

*Firm/Agency Name*

301 North Lake Avenue, Suite 920

*Street Address*

Pasadena, California 91101

*City, State, Zip Code*

(213) 330-7150

*Telephone Number*

(213) 330-7152

*Fax Number*

christopherp@hbsslaw.com

*Email Address*

290235

*Designee's California State Bar Number*

I hereby consent to the foregoing designation as local counsel, and declare under penalty of perjury that I maintain an office in the Central District of California for the practice of law, in which I am physically present on a regular basis to conduct business.

Dated 8/2/2024

Christopher R. Pitoun

*Designee's Name (please type or print)*

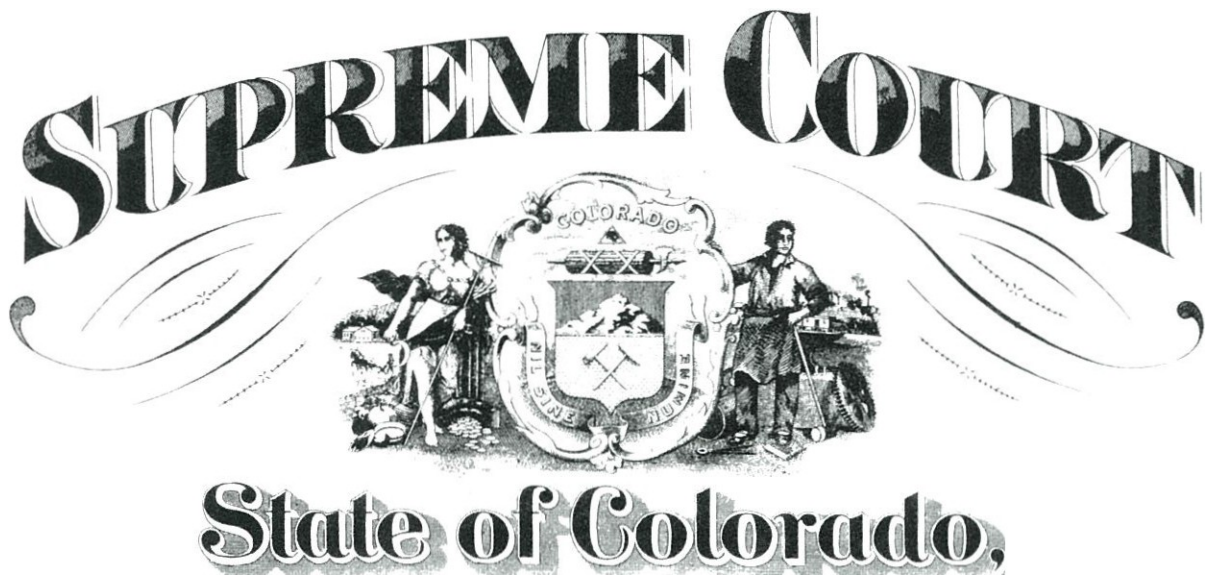
*Designee's Signature*

SECTION IV - SUPPLEMENT ANSWERS HERE (ATTACH ADDITIONAL PAGES IF NECESSARY)

Continuation of all state and federal courts (including appellate courts) to which the applicant has been admitted:

United States District Court for the District of CO, February 26, 1997 - Good Standing  
United States District Court for the Eastern District of MI, June 21, 2000 - Good Standing  
United States District Court for the Western District of WI, July 11, 2011 - Good Standing  
United States Court of Appeals 7th Circuit, January 8, 2010 - Good Standing  
United States Court of Appeals 9th Circuit, January 28, 1988 - Good Standing  
United States Court of Appeals 10th Circuit, July 12, 1988 - Good Standing  
United States Court of Appeals for the Federal Circuit, October 22, 2009 - Good Standing  
Supreme Court of the United States, December 9, 1991 - Good Standing





STATE OF COLORADO, ss:

I, Cheryl Stevens, Clerk of the Supreme Court of the State of Colorado, do hereby certify that

ROBERT B. CAREY

has been duly licensed and admitted to practice as an

*ATTORNEY AND COUNSELOR AT LAW*

within this State; and that his/her name appears upon the Roll of Attorneys

and Counselors at Law in my office of date the 27<sup>th</sup>

day of November A.D. 1987 and that at the date

hereof the said ROBERT B. CAREY is in good standing at this Bar.



IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the Seal of said Supreme Court, at Denver, in said State, this

23<sup>rd</sup> day of July A.D. 2024

*Cheryl Stevens*

Clerk

By

*Christo Miller*

Deputy Clerk

CERTIFICATE OF GOOD STANDING  
ISSUED BY THE DISCIPLINARY CLERK  
FOR AND ON BEHALF OF  
THE SUPREME COURT OF ARIZONA

The Disciplinary Clerk, pursuant to Rule 74, Rules of the Supreme Court of Arizona, hereby certifies that according to the records of the State Bar, **ROBERT B CAREY**, was duly admitted to practice as an attorney and counselor at law in all courts of Arizona by the Supreme Court of Arizona on May 9, 1987, and is now, as of the date of this Certificate, an active member of the State Bar of Arizona in good standing.



Given under the seal of the Disciplinary  
Clerk of the Supreme Court of Arizona  
this 07-26-2024

*Kristina Tuba*

Kristina Tuba  
Associate Disciplinary Clerk